UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

AA MEDICAL P.C.,

Plaintiff,

Docket No. 20-cv-03852 (DG)(JMW)

NOTICE OF MOTION

v.

KHALED ALMANSOORI, M.D.,

Defendant.

PLEASE TAKE NOTICE that, upon the Attorney's Declaration of Adam I. Kleinberg and the exhibits annexed thereto; the accompanying Memorandum in Support; and upon all pleadings and proceedings heretofore had herein, defendant Khaled Almansoori, M.D. ("Dr Almansoori") will move this Court before the Honorable James M. Wicks at the United States District Court for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, NY 11722, on a date and time to be determined by the Court, for an Order pursuant to Rule 3(C) of the Magistrate Judge's Individual Rules and the Court's inherent authority, staying discovery pending the Court's determination of Dr. Almansoori's motion to dismiss plaintiff's Amended Complaint

WHEREFORE, Dr. Almansoori respectfully requests that the Court grant a stay on discovery pending the Court's determination of Dr. Almansoori's motion to dismiss the Amended Complaint.

DATED:

Carle Place, New York

August 17, 2021

SOKOLOFF STERN LLP Attorneys for Defendant

By:

ADAM I. KLEINBERG 179 Westbury Avenue Carle Place, New York 11514 (516) 334-4500 File No. 200139

TO: David Antwork, Esq. (via email)